

Exhibit 1-2

Publication Notice (for Disclosure Statement Hearing)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Objection Deadline: August 8, 2023

Hearing Date and Time:
August 22, 2023 at 10:00 a.m.

**NOTICE OF (I) DEADLINE FOR OBJECTING TO
SOLICITATION PROCEDURES MOTION, (II) HEARING TO CONSIDER
APPROVAL OF DISCLOSURE STATEMENT FOR AMENDED CHAPTER 11 PLAN
OF REORGANIZATION AND (III) RELATED MATTERS**

PLEASE TAKE NOTICE THAT on June 26, 2023, LTL Management LLC (the
“Debtor”) filed the *Amended Chapter 11 Plan of Reorganization of LTL Management LLC*

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is
501 George Street, New Brunswick, New Jersey 08933.

[Dkt. [●]] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Plan”).² On July 11, 2023, the Debtor filed:

- the *Disclosure Statement for Amended Chapter 11 Plan of Reorganization of LTL Management LLC* [Dkt. [●]] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “Disclosure Statement”); and
- the Debtor’s *Motion for Entry of Order (A) Approving Form and Manner of Notice of Hearing on Disclosure Statement; (B) Approving Disclosure Statement; (C) Establishing Solicitation and Tabulation Procedures; (D) Scheduling a Hearing on Confirmation of Chapter 11 Plan and Approving Form and Manner of Notice Thereof; and (E) Granting Related Relief* [Dkt. [●]] (the “Solicitation Procedures Motion”).

PLEASE TAKE FURTHER NOTICE THAT:

1. The United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”) has scheduled a hearing for **August 22, 2023 at 10:00 a.m. (prevailing Eastern Time)** (the “Disclosure Statement Hearing”) to consider whether to approve the Disclosure Statement as containing “adequate information” within the meaning ascribed to such term in section 1125 of the Bankruptcy Code and whether to approve certain procedures for soliciting and tabulating votes to accept or reject the Plan (the “Solicitation Procedures”) attached to the Solicitation Procedures Motion as Exhibit 1.

2. Pursuant to the Solicitation Procedures, only holders of Class 4 Claims (Talc Personal Injury Claims) and holders of Class 6 Interests (Equity Interests of the Debtor) are entitled to receive a ballot for casting a vote on the Plan (a “Ballot”). Holders of Claims in all other Classes under the Plan are deemed to accept the Plan, because they are Unimpaired by the Plan.

3. At the Disclosure Statement Hearing, the Bankruptcy Court will consider all of the relief sought in the Solicitation Procedures Motion, including whether to allow Talc Personal Injury Claims solely for voting purposes in the amount of \$1.00 in the aggregate per claimant pursuant to Bankruptcy Rule 3018(a).

4. The Disclosure Statement Hearing will be held before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the Bankruptcy Court, located at the Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Courtroom No. 8, Trenton, New Jersey 08608.

5. The Plan provides a mechanism by which Talc Personal Injury Claims against the Debtor will be channeled to a trust established pursuant to sections 524(g) and 105(a) of the Bankruptcy Code. Upon approval of the Disclosure Statement, the Debtor intends to solicit holders of Talc Personal Injury Claims and Equity Interests of the Debtor for support of the Plan. You should read the Plan and Disclosure Statement carefully for details about how the Plan, if

² Capitalized terms used but not otherwise defined herein have the meanings given to such terms in the Plan.

approved, will affect your rights. For the specific terms and conditions of all the releases and injunctions provided for in the Plan, and the precise scope of the Claims and demands to be channeled, please refer to the specific terms of the Plan, which can be obtained as described below.

6. If you would like to object to approval of the Disclosure Statement or any of the other relief sought by the Debtor in the Solicitation Procedures Motion, including approval of the Solicitation Procedures and the allowance of Talc Personal Injury Claims solely for voting purposes in the amount of \$1.00 in the aggregate per claimant you may do so by filing your objection no later than **August 8, 2023** (the “Objection Deadline”). Objections, if any, must: (a) be in writing; (b) conform to the Bankruptcy Rules and the Local Rules of U.S. Bankruptcy Court for the District of New Jersey (the “Local Bankruptcy Rules”); (c) state the name, address, telephone number and email address of the objecting party and the amount and nature of the Claim or Equity Interest of such party; (d) state with particularity the basis and nature of any objection or response and include, where appropriate, proposed language to be inserted in the Disclosure Statement to resolve any such objection or response; and (e) be filed with the Bankruptcy Court 402 East State Street, Trenton, New Jersey 08608 and together with proof of service, and be served so as to be **RECEIVED on or before the Objection Deadline** by:

(a) counsel to the Debtor, (i) Jones Day, 2727 N. Harwood Street, Dallas, TX 75201 (Attn: Gregory M. Gordon, Brad B. Erens, Dan B. Prieto, and Amanda Rush) and (ii) Wollmuth Maher & Deutsch LLP, 90 Washington Valley Road, Bedminster, NJ 079211 (Attn: Paul R. DeFilippo, James N. Lawlor, and Joseph F. Pacelli);

(b) counsel to the TCC, (i) Brown Rudnick LLP, Seven Times Square, New York, New York 10036 (Attn: David J. Molton, Michael S. Winograd, Susan Sieger-Grimm, and Kenneth J. Aulet) and One Financial Center, Boston, Massachusetts 02111 (Attn: Jeffrey L. Jonas, Sunni P. Beville, and Eric R. Goodman) and (ii) Genova Burns LLC, 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920 (Attn: Daniel M. Stolz, Donald W. Clarke, and Gregory S. Kinoian);

(c) the FCR (i) Randi S. Ellis, LLC, 5757 Indian Circle, Houston, TX 77027 (Attn: Randi S. Ellis) and (ii) counsel to the FCR, Walsh Pizzi O'Reilly Falanga LLP, Three Gateway Center, 100 Mulberry Street, 15th Floor, Newark, New Jersey 07102 (Attn: Mark Falk, Stephen V. Falanga, and Liza M. Walsh);

(d) counsel to the AHC of Supporting Counsel, (i) Paul Hastings LLP, 200 Park Avenue, New York, New York 10166 (Attn: Kris Hansen) and 71 South Wacker Drive, Suite 4500, Chicago, Illinois 60606 (Attn: Matthew M. Murphy and Matthew Micheli); and (ii) Cole Schotz P.C., Court Plaza North, 25 Main Street, P.O. Box 800, Hackensack, New Jersey 07692-0800 (Attn: Michael D. Sirota); and

(e) the Office of the United States Trustee for the District of New Jersey, One Newark Center, Ste 2100, Newark, New Jersey 07102 (Attn: Jeffrey M. Sponder and Lauren Bielskie).

OBJECTIONS NOT TIMELY FILED AND SERVED IN SUCH MANNER MAY NOT BE CONSIDERED BY THE BANKRUPTCY COURT AND MAY BE DEEMED OVERRULED WITHOUT FURTHER NOTICE.

**COPIES OF SOLICITATION PROCEDURES
MOTION, DISCLOSURE STATEMENT, AND PLAN**

7. Copies of the Solicitation Procedures Motion (including the Solicitation Procedures and the other exhibits to the proposed order approving the Solicitation Procedures Motion), Disclosure Statement, and Plan are available for review free-of-charge on the website maintained by the Debtor's claims, noticing, balloting and solicitation agent, Epiq Corporate Restructuring, LLC (the "Solicitation Agent"), at <https://dm.epiqll.com/case/ltl>. Copies of the foregoing are also available upon request by contacting the Solicitation Agent at LTLVote@epiqglobal.com or at (888) 431-4056 (Toll-Free) or +1 (503) 822-6762 (International). The Disclosure Statement, the Plan, and the Solicitation Procedures Motion are on file with the Clerk of the Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608, and may be examined by parties in interest by visiting the Office of the Clerk of the Bankruptcy Court during business hours or viewed on the Bankruptcy Court's website by following the directions for accessing the ECF system at <https://www.njb.uscourts.gov>.

8. The Debtor and any other party in interest may file a response in support of approval of the Disclosure Statement or any of the other relief sought by the Debtor in connection with the Solicitation Procedures Motion on or before **August 18, 2023**.

9. Following approval of the Disclosure Statement by the Bankruptcy Court, holders of Talc Personal Injury Claims and Equity Interests against the Debtor will receive a copy of the Disclosure Statement, the Plan, and various documents related thereto, unless otherwise ordered by the Bankruptcy Court.

10. THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PLAN. VOTES ON THE PLAN MAY NOT BE SOLICITED UNLESS AND UNTIL THE PROPOSED DISCLOSURE STATEMENT IS APPROVED BY AN ORDER OF THE COURT.

Dated: [_____]

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
James N. Lawlor, Esq.
Joseph F. Pacelli, Esq. (admitted *pro hac vice*)
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com
jlawlor@wmd-law.com
jpacelli@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR